

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

EASTERN DIVISION

No. 05-10849RGS

HELEN RUNGE,

Plaintiff

v.

WALTER J. KELLY,
KERRY L. BLOOMINGDALE, M.D., and
SUNBRIDGE NURSING AND
REHABILITATION CENTER,

Defendants

**LOCAL RULE 37.1 CERTIFICATION RELEVANT TO
DEFENDANT WALTER J. KELLY'S MOTION TO COMPEL
THE PLAINTIFF TO PROVIDE SIGNED ANSWERS TO INTERROGATORIES**

On August 18, 2006, Defendant sent Plaintiff's counsel a letter pursuant to Local Rule 37.1 requesting a discovery conference regarding Plaintiff's overdue Answers to Interrogatories. As a result of the discovery conference, Plaintiff provided unsigned Answers to Interrogatories. After another conference with Plaintiff's counsel regarding the unsigned interrogatories, Plaintiff's counsel provided a "verification" of discovery responses by Gilbert Stanley, Plaintiff's purported Power of Attorney. Again, Defendant's counsel requested that Plaintiff herself sign her purported Answers to Interrogatories, or that Plaintiff's counsel at least advise Defendant's counsel that Plaintiff is unable. No response has been received to date.

s/ Michele Carlucci

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CERTIFICATE OF SERVICE

I, Michele Carlucci, certify that on October 13, 2006 I have served a copy of the following by electronic filing and regular mail:

1. Defendant Walter J. Kelly's Local Rule 37.1 Certification relevant to Defendant's Motion to Compel the Plaintiff to Provide Signed Answers to Interrogatories.

to all counsel of record:

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/s/ Michele Carlucci
Michele Carlucci